Ford Motor Company

Office of the General Counsel

Ford Motor Company
Parklane Towers West
Suite 1500
Three Parklane Boulevard
Dearborn, Michigan 48126-2568

January 18, 2006

Via Overnight Mail

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency
Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

Safety Light Corporation Site

Dear Harry:

Enclosed is Ford Motor Company's response to U.S. EPA's information request pursuant to Section 104(e) of CERCLA regarding the above-referenced site. We appreciate the extension of time you granted in order to allow us to complete a diligent and thorough review of potentially relevant records and interview current and former employees most likely to have knowledge with regard to the subject of the request. If you have any questions, please contact me.

Very truly yours,

Kathy J. Hofer
Counsel

Enclosure

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3

In the Matter of:	)	Ford Motor Company's Response
	)	to Request for Information
Safety Light Corporation Site	)	
Bloomsburg, Pennsylvania	)	

GENERAL OBJECTIONS

The following is Ford Motor Company's ("Ford's") response to U.S. EPA's undated Request for Information regarding the above-referenced matter, received by the Chairman's Office at Ford on November 10, 2005. Ford objects to this Request for Information on the grounds, among others, that:

1. The definitions of terms in Enclosure 2 are overly broad and seek to impose obligations that are unduly burdensome and oppressive and not required by the Comprehensive Environmental Response, Compensation and Liability Act of 1980 ("CERCLA") or the Superfund Amendments and Reauthorization Act of 1986 ("SARA"), particularly to the extent that they seek to define such terms more broadly than does Section 101 of CERCLA.

2. The Request purports to require that a search be conducted for information regarding potential transactions over the past sixty years and therefore is overly broad and seeks to impose obligations that are unduly burdensome.

3. The Request purports to require that a search be conducted without geographic limitation and therefore is overly broad and seeks to impose obligations that are unduly burdensome.

4. The Request purports to require a response based on information that Ford does not possess or control including, but not limited to, information in the possession, custody and control of vendors, former employees and agents, U.S. government agencies and employees, and other persons.

5. The Request purports to impose a continuing obligation to supplement Ford's response, although no supplementation is required by CERCLA or SARA.

PRELIMINARY STATEMENT

Without waiving or in any way limiting any objection that it has or may have to this Request for Information, Ford states that it has thoroughly reviewed the information and documents contained within corporate files it has maintained to document compliance with various permits issued to Ford by the United States Nuclear Regulatory Commission ("U.S. NRC"). In addition, Ford has conducted inquiries within its corporate purchasing, scientific research, and industrial hygiene activities, and has interviewed a number of current and retired employees responsible for compliance with U.S. NRC requirements and/or with knowledge of the Company's practices regarding disposal of radioactive materials. Reserving all rights and without waiving any objections it has or may have, Ford responds as follows:

QUESTIONS

Question 1. Describe in detail the business relationship between Ford and Safety Light.

Response:

For purposes of this response, Ford assumes that "Safety Light" means Safety Light Corporation and the predecessor or affiliated companies identified in the opening paragraph of U.S. EPA's information request. Based on information provided by U.S. EPA, and on our internal investigation, it appears that Ford and one of its former subsidiaries may have purchased, directly or indirectly, products manufactured by Safety Light or its predecessors or affiliates, as described below:

(a) The copies of two ledger sheets that accompanied U.S. EPA's information request purport to show that Ford purchased "Radium D foil" from Safety Light or a predecessor or affiliate, although there is no indication on the face of the ledger sheets of the name of the corporation from which Radium D foil may have been purchased, and no indication of the year in which the two purported transactions allegedly occurred. Despite a diligent investigation, Ford has not been able to independently confirm the purchases that are implied by the ledger sheets (included as Attachment A) provided by U.S. EPA. Ford has confirmed, however, that the P.O. Box number referenced on the ledger sheets is the P.O. Box number for Ford's Scientific Research Laboratory.

(b) A document located by Ford suggests that it purchased a gas chromatograph for laboratory use by its Stationary Source Environmental Control Office ("SSECO") in 1982 or earlier. The document (see Attachment B) indicates that the manufacturer of the radiation source within the equipment (Model 508-1 foil) was U.S. Radium Corp. The document indicates that the gas chromatograph subsequently was transferred to the Scientific Research Laboratory.

(c) A document located by Ford suggests that a facility (the Connorsville Plant) owned by its former subsidiary (Ford Electronics and Refrigeration Corporation) purchased self-illuminating exit signs that were manufactured by Isolite.

Question 2. Did Ford ever transport and/or broker hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite to the Site?

Response:

Ford has located no documents or discovered any information to suggest that it ever transported or brokered any hazardous substances and/or radioactive waste or other wastes to the Site. See also the response to Question 4.

Question 3. If you answered "yes" to Question 2, please answer the following questions:

a. Provide the name, current address (or most recent address available), telephone number, and contact person for each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes.

b. Provide the time period during which you transported/brokered each customer/generator/transporter's hazardous substances, radioactive waste or other wastes.

c. For each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes, provide:

i. the entity which received the hazardous substances, radioactive waste or other wastes (i.e., U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite);

ii. the type of hazardous substances, radioactive waste or other wastes that was disposed/reclaimed;

iii. the amount of hazardous substances, radioactive waste or other wastes transported/brokered to the Site by you;

iv. the dates of the pickup/delivery of the hazardous substances, radioactive waste or other wastes;

v. all personal and internal company documents and correspondence regarding the type and amounts of hazardous substances, radioactive waste or other wastes, dates transported/brokered to the Site, and transactions with U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite;

vi. the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other parties that have documentation or information pertaining to the transportation/disposal of hazardous substances, radioactive waste or other wastes at the Site.

Response:

Not applicable.

Question 4. Did Ford ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site?

Response:

Ford has located no documents or discovered any information to suggest that it ever generated any radioactive wastes or other wastes that were disposed of or reclaimed at the Site. Ford believes that the materials that it (or its former subsidiary) purchased, that may have contained source materials supplied by Safety Light Corporation or a predecessor or affiliated corporation, were disposed or reclaimed at locations other than the Site:

(a) It was the general practice of Ford's Scientific Research Laboratory that radioactive wastes were stored in a secure storage vault prior to disposal at commercial disposal firms. Attachment D consists of two memoranda that describe such practice. The first was authored some time between 1967 and 1972; the second is dated March 21, 1983.

With regard to the Radium D foil purportedly purchased by Ford, we reviewed disposal records for the Scientific Research Laboratory and found no documents referencing "Radium D foil"; however, we understand from multiple authorities that the "source material" for this product is in fact "Pb210". We found reference to disposal, in 1985, of a "Pb210" source described as "old 196x" (referring to the approximate date of acquisition). The exact date of acquisition apparently could not be determined. As noted in Attachment E, the disposal was part of an effort to rid the Scientific Research Laboratory storage vault of "all radioactive sources/materials and/or standards that for several years have not been fully used or whose radioactive half-life has depleted their activity to zero." (See Attachment E, page 1 of 7). Pickup of the wastes and their disposal, according to the documents, apparently was handled by AdCO. Reference to the "old 196x" Pb210 source is on page 7 of 7 of Attachment E.

(b) It appears that the tritium source (U.S. Radium) within the gas chromatogragh acquired by Ford's Stationary Source Environmental Control Office ("SSECO"), and subsequently transferred to the Scientific Research Laboratory, was disposed in 1990 through U.S. Ecology. See Attachment G.

(c) The documents included in Attachment H indicate that the Connorsville Plant returned all of the self-illuminating exit signs to the vendor from which they were purchased – Connorsville Elect. Supply Co.

Question 5. If you answered "yes" to Question 4, please address the following issues:

a. Please provide the following information regarding all wastes and by-products produced by your company during the period 1945 to the present:

i. the nature of radioactive waste or other wastes, hazardous substances, and/or by-products used, including their chemical content, characteristics, and physical state (i.e., liquid, solid, gas, or in the form of contaminated rags, cups, containers). Provide chemical analyses and Material Safety Date Sheets ("MSDSs"). If these analyses are not available for the period 1977-1991, submit analyses for the time period closest to these dates and describe, in detail, any changes in the process(es) in which radioactive wastes or other wastes were produced that would affect the chemical analyses;

ii. the annual quantity of radioactive waste or other wastes, hazardous substances, and/or by-products used or generated;

iii. the process(es) in which radioactive wastes or other wastes, hazardous substances, an/or by-products were used or the process(es) that generated each;

iv. the types of containers used to treat, store, or dispose of radioactive waste or other wastes, hazardous substances, and/or by-products; and

v. the method of treatment and/or disposal of the above.

b. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons, including you, who, during the period 1945 to the present, may have:

i. disposed of or treated radioactive or hazardous materials at the Site;

ii. arranged for the disposal or treatment of radioactive or hazardous materials at the Site; and

iii. arranged for the transportation of radioactive or hazardous materials to the Site (either directly or through transshipment points) for disposal or treatment.

c. If your response to the above includes the contracting of a hauler or transporter to transport and/or dispose of wastes, explain these arrangements and provide documentation confirming the nature of those transactions. Please identify:

i. the persons with whom you, or other such persons, made such arrangements;
ii. every date on which such arrangements took place;

iii. for each transaction, the nature and quantity of material, including its chemical content, characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that the generated the substance;

iv. the precise location at which each material was disposed or treated at the Site;

v. the persons who selected the Site as the place at which materials were disposed or treated;

vi. the final disposition of each material involved in such transactions; and

vii. the names of employees, officers, owners, and agents for each transporter.

d. For each and every instance in which you/your company arranged for disposal or treatment of materials at the Site, identify:

i. the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed, or otherwise handled by you; and

ii. any billing information and documents (invoices, trip tickets, manifests) in you possession regarding arrangements made with you company to generate, treat, store, transport, or dispose of materials at the Site.

e. Provide the names, titles, and areas of responsibility of any persons, including all Ford employees, present and former, who are knowledgeable of the waste disposal practices of your company during the period 1945 to the present. Include current addresses and dates of birth for former employees.

f. Describe any permits or applications and any correspondence between Ford and any regulatory agencies regarding materials transported to or disposed at the Site.

g. Provide copies of any correspondence between Ford and any third party regarding materials transported or disposed of at the Site.

h. Provide the identity of, and copies of any documents relating to, and other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such materials to the Site.

i. Provide the identities of all predecessors-in-interest who, during the period 1945 to the present, transported to or stored, treated, or otherwise disposed of any materials at the Site and describe in detail the nature of your predecessor-in-interest's business.

j. Provide the name, title, address, and telephone number of the person answering these questions on behalf of the respondent.

k. For each question, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation the answers, or who supplied documents reviewed or relied upon in the course of preparing your answers.

Response:

Not Applicable.

Question 6. If you have reason to believe that there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.

Response:

Ford has no reason to believe that there may be such persons. See, however, response to Question 8 below.

Question 7. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody, or control, then provide the names, titles, areas of responsibility, current addresses, and telephone numbers of the persons from whom such information or documents may be obtained.

Response:

Ford has no reason to believe that information or documents responsive to this Request are in the possession, custody or control or any other person. See, however, response to Question 8 below.

Question 8. If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.

Response:

We suggest that, given its authority to regulate the usage (including disposal) of radioactive materials within the United States, the U.S. Nuclear Regulatory Commission ("U.S. NRC") would be a likely source of information that may assist the Agency in its investigation of the Site. Ford has no information regarding any specific persons with knowledge, or of any specific relevant information, that may be contained with the U.S. NRC's files.

Question 9. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If pertinent records or documents were destroyed or are missing, provide us with the following:

a. Your document retention policy;

b. A description of how the records were destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;

c. A description of the type of information that would have been contained in the documents; and

d. The name, job title and most current address known by you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

Response:

Not applicable.

Radium "D" Foil

May 21		Westinghouse Electric Corp.	
P-42983-1		Res. Labs, Ardmore Blvd.	
		East Pittsburgh, Pa.	
		3-in² Rad Foil 1/4 x 1/2 x T200	6000
	27	Electronic Products	
P-43147-1		111 E. 3rd. St.	
N/C		Mt. Vernon, N.Y.	
		1- Section Rad Foil	
		1/4 x 1/2 x T200	250
June 28		Ford Motor Co.	
P-42120-1		Resident Controller, Engrg	
		P.O. Box 2053	
		Dearborn, Mich.	
		5- Pcs Rad Foil per Dwg.	
		Sol. withdrawn - compact made	
		(not from this foil stock)	
		281.3 µg	

Attachment A
1 of 2

July 17	Ford Motor Co.	
P-84060-1	P.O. Box 2053	
84061-1	Dearborn, Michigan	
84062-1	Item 1-7 plates	Ra D foil 16 pcs foil
	2 2 plates	5.8 x 6.25 x T2.76 (100 ug cm) 1600 ug.
	3 9 dummy plates	
	4 2 plates	Ra D foil 6 pcs foil
	5 2 plates	4.15" x 6.25 x T8.77 (200 ug cm) 1200 ug.
	6 4 dummy plates.	
		Total 2800 ug.
		for order
July 18	White's Electronics	[illegible] foil
AF9215	1218 Main St.	
	Sweet Home, Oregon	
	1 pc foil .047 x .047 x T60	0.1 ug
	State University of Iowa	
Aug. 20	Iowa City, Iowa	
P-184045-1	2 Ra D I sources 6,000, 30,000 [illegible] particles/sec.	

Attachment A

2 of 2

J. M. Meinke
SSEC Office
Parklane Towers West

Industrial Hygiene & Toxicology Department
Employe Health Services
Radiological Leak Test/Source Inspection

FU. 6/82

The Federal and/or State required periodic audit of the sealed radioactive material listed (was) ~~(was not)~~ found satisfactory. Government regulations require that the results be retained in plant files for review. The plant safety office files are suggested.

Company Location SSECO — Dates of Inspections

Source Holder Make U.S. Radium Corp. — Field December 1982

Source Location Corporate Radiation Lab — Laboratory --

Identification Serial/Model #	Isotope	mCi	Field Results Source	Shutter	Signs	Laboratory Results Microcuries
U.S. Radium Model 508-1 foil in						
Analytical Dev. Corp. Model 510-6007	Tritium	200	--	Not applicable	Yes	Not required
Detector Cell - For AID Gas						
Chromatography Use						

License Authorization: ~~U.S. NRC License No. 21-04114-25 (expires 3/31/83)~~ Lic. Terminated

Remarks: Source securely stored in Corporate Radiation Protection Lab - 5-year NRC License renewal planned <3/31/83.
TRANSFERED TO Sci Lab Lic #12

Field wipe sample measured with appropriate Geiger Mueller meter and subsequent laboratory determination performed with Scintillation counter or equivalent. Wipe test performed on surfaces of sealed source container where potential leakage may occur such as windows and seals of source holder. For regulatory purposes, the presence of 0.005 microcuries or more of removable contamination is evidence that the source is leaking.

Data Retrieval No. --
Location Code

D. A. Greschaw
Corporate Radiation Specialist

Attachment B 1 of 1

Attachment C 1 of 1

February 26, 1991

To: Don Greschaw

From: F. B. Johns

Subject. Self-Illuminating Exit Signs

I have listed the following information you requested on the Isolite exit signs we have.

1. Serial numbers, A00 1637, A00 1638, A00 1641, A00 1642 A00 1643, A00 1644, A00 1645, A00 1645, A00 1646, A00 1647 A00 1648, ALL DATED 10-90
2. Serial numbers, A08 2613, A08 2614, A08 2615, A08 2616 A08 2617, A08 2618, A08 2619, A08 2620, A08 2621, A08 2622 A08 2623, ALL DATED 8-90
3. Have attached the copy of labels on one sign below.

ISOLITE®
SAFETY LIGHT CORP BLOOMSBURG, PA

CAUTION - RADIOACTIVE MATERIAL
CONTAINS 7 CURIES TRITIUM

THE RECEIPT, POSSESSION, USE, AND TRANSFER OF THIS DEVICE, ARE SUBJECT TO A GENERAL LICENSE OR THE EQUIVALENT AND THE REGULATIONS OF THE U.S. NUCLEAR REGULATORY COMMISSION OR A STATE WITH WHICH THE NRC HAS ENTERED INTO AN AGREEMENT FOR THE EXERCISE OF REGULATORY AUTHORITY.

DO NOT DISMANTLE OR OPEN THIS DEVICE UNLESS SPECIFICALLY LICENSED BY NRC OR AN AGREEMENT STATE.

DO NOT SELL, TRANSFER, ABANDON OR DISPOSE OF THIS DEVICE EXCEPT BY TRANSFER TO PERSONS SPECIFICALLY LICENSED BY NRC OR AN AGREEMENT STATE.

USE OF THIS DEVICE IS PROHIBITED IF THERE IS ANY INDICATION OF FAILURE OF OR DAMAGE TO CONTAINMENT OF RADIOACTIVE MATERIAL.

LOSS, THEFT OR TRANSFER OF THIS DEVICE TO ANOTHER LICENSEE AND FAILURE OR DAMAGE TO SHIELDING OR SOURCE CONTAINMENT MUST BE REPORTED TO NRC OR AGREEMENT STATE.

PENNSYLVANIA CERTIFICATE OF APPROVAL NO 3998

SERIAL NO A082614 MODEL NO 3000 DATE 8-90

REMOVAL OF THIS LABEL IS PROHIBITED

'SOLITE'
SAFETY LIGHT CORP BLOOMSBURG, PA.

CAUTION-RADIOACTIVE MATERIAL
CONTAINS 7 CURIES TRITIUM

SERIAL NO. A082614 MODEL NO. 3040 DATE 8-90

THE RECEIPT, POSSESSION, USE, AND TRANSFER OF THIS DEVICE, ARE SUBJECT TO A GENERAL LICENSE OR THE EQUIVALENT AND THE REGULATIONS OF THE U.S. NUCLEAR REGULATORY COMMISSION OR A STATE WITH WHICH THE NRC HAS ENTERED INTO AN AGREEMENT FOR THE EXERCISE OF REGULATORY AUTHORITY.

DO NOT DISMANTLE OR OPEN THIS DEVICE UNLESS SPECIFICALLY LICENSED BY NRC OR AN AGREEMENT STATE.

DO NOT SELL, TRANSFER, ABANDON OR DISPOSE OF THIS DEVICE EXCEPT BY TRANSFER TO PERSONS SPECIFICALLY LICENSED BY NRC OR AN AGREEMENT STATE.

USE OF THIS DEVICE IS PROHIBITED IF THERE IS ANY INDICATION OF FAILURE OF OR DAMAGE TO CONTAINMENT OF RADIOACTIVE MATERIAL.

Summary of Review of Radiation Program

Scientific Research Staff

Requested by Mr. C. D. Melvin, Administration, (Ext. 32605)

Purpose: Industrial hygiene take over of Radiation Program, precipitated by the past Radiation Officer, Dr. R. Marsh being transferred, and Assistant W. Allie on other projects.

Radioactive Material

AEC License No. 21-04114-12 (currently at AEC for renewal), Broad Type, primarily authorizing Research and Development with any byproduct material, between Atomic Nos. 3 and 83 up to 1.3 curies per radionuclide, used by or under supervision of Scientific Research Staff Radiological Review Board.

Room S3044, B & D Counting rooms and low level (uu Ci) - laboratory.

Room S3044A - "Hot Lab" - (currently 35 sources) - locked - 3 keys for access Storage Vault; Ventilation; Filters; Shielding; Surface Smears; Packing/Unpacking Shipments; Strip Paint; Liquid/Solid Disposal Storage; Experiments; Audio Area Radiation Monitor

Neutron Activation

Various samples transported to U of M Phoenix Memorial Reactor for irradiation and returned to Scientific Building (past 200/yr. - future 400/yr.)

Byproduct Control

Experiments - Needed written precautions and approval by RPO;purchases -Approval by RPO
Irradiation Service - " " "
Routine L. Tests
Surface Contamination/Proper Disposal at Termination of Experiments

X-ray Radiation

Approximately 22 X-ray sources registered.
A wide range of laboratory analytical equipment that are sources of ionizing radiation. Mr. M. Short supervises majority of the equipment and has an excellent program of added shielding and interlocks to minimize exposure. With the assistance of RPO, requires a periodic survey schedule and survey during equipment set up periods such as alignment.

Disposal

Storage in Hot Lab; Container - Liquid (solidified periodically); Container - Solid; Commercial Disposal Firms; Incineration at Veterans Hospital, Allen Park-Discontinued; Sewer-Liquid, Low Level; Filters.

Attachment D 2 of 4

Personnel Monitoring

Film Badges/Finger, Wrist, Whole Body - Approximately 60 employes
Distribution
Review Results

Radiation Detection Instruments

2-Eberline, Model RM3A Monitor (1-Hot Lab 1-Low level hole)
3-Victoreen Thyac III, Model 490, Survey Meters
1-Victoreen Fluoroscopic Diagnostic, Model 666 (for accumulated dose - up to 3,000 R)
1- " Cutie Pie, Model 740-B, Survey Meter
1-Tracerlab, Survey Meter, Model SUIE
9-Beckman, Model 102, direct reading dosimeters (no good)
1-Berthold, Model TPL/D HP Survey Meter (good for narrow X-ray beams) - M. Short uses
1-Victoreen, Model 440 " " "
1-Scintillation Counter Probe, Victoreen (good for "lost" sources, low level work)

Wide Range Instruments

Counting equipment, in addition, instruments available to personnel as needed/requested.
Calibration - Semiannual by RPO (10 M Ci Cs^{137})
Repair - Scientific Building/Manufacturer

Records - (currently stored in Room 3066 and Room 1026)
Maintained by RPO, or under his direction

- Receipt
- Approvals
- Disposal
- Irradiation Services
- AEC License
- Film Badge Monitoring Results
- Inventory
- Contamination Studies

Applicable Regulations/Requirements

AEC Part 20, Code of Federal Regulations "Standards for Protection Against Radiation"

License No. 21-04114-12 Conditions
Procedures in License Application, Date-November 10, 1967
Department of Transportation Regulations where indicated.

Michigan Radiation Regulations

OSHA " "

AEC Inspections Reported as approximately once a year

Scientific Research Staff Radiation Personnel

Scientific Research Staff Radiological Review Board

Richard H. Marsh, Ph.D. - Chairman (and AEC RPO) (Ford-Ann Arbor-Tel.8432-7644284)

W. R. Pierson, Ph.D. - Radio Chemist (Ext. 31719)

C. H. Roeske - Administration, Scientific Research Staff (Ext. 29258)

Other Personnel

C. D. Melvin - Administration, Elect. & X-ray Optics (Ext. 32605)

M. A. Short - Electronics & X-ray Optics (Ext. 75051)

W. Allie - RPO - (now in X-ray Optics) (Ext. 31533- Home: 563-0363

M. Elgart, Ph.D. - Neutron Activation Program (replaces Dr. Marsh)

J. W. Butler - Analytical Engineer (Ext. 31308)

6
12/72

Attachment D 4 of 4

Inter Office

Personnel and Organization Staff

March 21, 1983

To: J. R. Reitz
A. T. Vulpetti

cc W. J. Rooney
A. B. M. Houston
C. F. Wilkins

Subject: Disposal of Low-Level Radioactive Waste - NRC Final Rules

The attached U.S. Nuclear Regulatory Commission (NRC) final rule specifies the licensing procedures and requirements for the land disposal of low level radioactive waste, with an effective date of December 27, 1983.

This new rule includes the requirement of NRC licensees generating waste (10CFR 20.311) Transfer for Disposal and Manifests, pages 57479 - 57480.

An initial review of this final rule indicates the following effect on Company NRC licensed activities:

- Other than normal license required transfer and shipping requirements, the new rule does not apply if a licensee is transferring a nuclear device to the manufacturer. Recent such disposal activities have been transfers to the manufacturer, or equivalent.

- The new rule would apply if being transferred to a commercial disposal concern, such as the occasional waste generated from company research and development activities.

It is requested that the specific applicable requirements be reviewed with your comments directed to the writer for any needed procedure changes, Ext. 78955.

D. A. Greschaw
Corporate Radiation Specialist
Industrial Hygiene & Tolicology Department
Employee Health Services

dw

1/23/84 - F.U. TO A. VULPETTI - SAME OK

Attachment E 1of 7

Ford

Inter Office

Research Staff

November 26, 1985

D. A. Greschaw

cc H. D. March
J. R. Reitz, Chairman, Radiation Safety Committee

Subject: Disposal of Radioactive Materials/Sources/Standards as of October 1985 and to be Picked-up by AdCO on or About November 22, 1985

Attached is a complete list of all radioactive sources/materials and/or standards that for several years have not been fully used or whose radioactive half-life has depleted their activity to zero. All these materials have been previously approved by AdCO for pick-up, including the thorium sources as well as the Am^{241} smoke alarm detector.

Attached also is the list of radioactive sources remaining either in the hot lab vaults and/or in various rooms of the Scientific Research Laboratories.

A. T. Vulpetti
Radiation Protection Supervisor

Records — 31583
Confirmed disposal completed and for Sci Lab - only - Grandall Security.
DG

HW7

1/86 – Entry PAC

Disposed Oct. 1985

Nov. 1985 Pick-up AdCO

source	Quantity	Date	Comments
* Thorium oxide (powder)	< 200 μCi	Not dated	user unidentified
Thorium " (solid)		"	" "
Thorium Silicide (powder)		"	" "
Thorium Boride (powder)		Nov. '83	" ", unopened
Thorium Nitrate (powder)		Not dated	", unopened
			" " ", unopened (Alpha
1 sheet of Uranium Metal (5 grms)	< 1 μCi	Not dated	" "
* Am-241	5 μCi	—	smoke detector source (no hous.
Po-210	40 mCi	1970	Air nozzle
5, Po-210	500 μCi/eliminator	10/76, 10/78, 10/80 4/73, 7/74	Static Eliminator
Cr-51	7 μCi	1981	stds. H. Sneck
Cr-51	6 μCi	1982	V. Markovac
H-3, benzo, pyrine	40 Ci/mmol	Not dated	—
H-3 H_2O dimethyl Sulfate	5 mCi	19 June 1979	stds. 2.5 ml Pano
H-3 triphosphate	250 μCi	31 May 1979	" 1 ml "
H-3 Uridine	250 μCi	Apr. 1979	ICN "
C-14 Uracil	100 μCi	Apr. 1979	ICN "
H-3 Phosphate deoxyatidine	.25 mCi	—	— "
H-3 Toluene	1 μCi	July 1976	— "
C-14 Benzo pyrine	60.7 mCi/mmole	Not dated	—
14 Soil Samples, 1980-81 + 4 stds. in soil samples			Ce^{137} < 0.1 μCi Nm. Pearson
Kr-85	—	Oct. 1984	Spark gaps (R. Anderso OGP445-18, 8335-00,
32 Thrust Washers	Neutron Activated	1980	< 0.1 μCi
* Am-241	5.75×10^4 APM	Aug. 1978	std.

* O.K. to dispose per John McCormick of AdCO 21 Nov. 1985

Disposed Entire Lot Nov. 1985

Isotope Inventory
Scientific Research Laboratories
(Dearborn)

Isotope	Source Sealed	Quantity µCi	Date Listed	Room	User	Title	Telephone
NA-22 Energy Standard	Yes	0.021	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
NA-22 Energy Standard	Yes	0.084	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
NA-22 Energy Standard	No	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
NA-22 Energy Standard	Yes	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
NA-22 Energy Standard	Yes	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
NA-22 Energy Standard	Yes	4.120	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
CO-60 Energy Standard	Yes	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
CO-60 Energy Standard	Yes	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072

Attachment E

3 of 7

CK. - O.K [illegible]

Isotope	Source Sealed	Quantity µCi	Date Listed	Room	User	Title	Telephone
NI-63 Energy Standard	No	0.206	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
ZN-65 Energy Standard	No	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
ZN-65 Energy Standard	No	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
TC-99 Energy Standard	No	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
RH-101 Energy Standard	Yes	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
RH-101 Energy Standard	Yes	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
CD-109 Energy Standard	No	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
CD-109 Energy Standard	No	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
CS-137 Energy Standard	Yes	0.023	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072

1967

1967

Disposed 1985

Attachment E 4 of 7

Isotope	Source Sealed	Quantity µCi	Date Listed	Room	User	Title	Telephone
CS-137 Energy Standard	Yes	0.023	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
CS-137 Energy Standard	Yes	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
CS-137 Energy Standard	Yes	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
PM-147 Energy Standard	No	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
EU-154 Energy Standard	Yes	0.130	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
EU-154 Energy Standard	Yes	1.700	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
HG-203 Energy Standard	Yes	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
HG-203 Energy Standard	Yes	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
TL-204 Energy Standard	No	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072
TL-204 Energy Standard	Yes	0.005	02/11/74	S-3044	W. Pierson	Staff Scientist	32-28072

Attachment E 5 of 7

N. PIERSON

SEALED SOURCES

Attachment E

Be-7	5/19/67
Cr-51	
Co-57	OLD
Co-57	"
Co-58	8/4/78
Co-60	1963/1965
Ni-67	1967
Zn-65	OLD
Zn-65	OLD
Se-75	1968
Se-75	1978
Sr-85	1968
Tc-99	OLD
Col-109	OLD ~ 196x.
Ce-139	1965
Pm-147	1966
HF-181	1967
Ta-182	OLD 196+
Tm-190	OLD 196+

(+TWO ON OTHER LIST)
Not found 3.10.81

All were disposed Nov. 198?

ROOM 3-3044
W. PIERSON

12.3.79
Attachment E 7 of 7

SEALED SOURCES

Tl - 204	1966	
Tl - 204	1966	(+ ONE ON OTHER LIST)
Tl - 204	1962	
Tl - 204	OLD	
Tl - 204	OLD	
Bi - 207	1962	
Bi - 207	1967	
Pb - 210	OLD 196x	
Bi - 207	OLD	

Disposed 1985

Attachment G 1 of 3

November 03, 1990

To: J. M. Norbeck
Radiation Safety Committee

cc : D. Greschaw

Subject : Disposal of Radiactive Sources : SRL

This communication is to inform you that the high level radioactive sources and all other radioactice sources stored in "Hot Lab", Room S - 3044C have been disposed of through U.S. Ecology. The laboratory is now ready for general laboratory use. But, it must be noted that according to our NRC license, this room or a room with the specific requirements as so designated in our license must be made available if a project utilizing radioactive tracer materials or the like should be used.

Annina T. Vulpetti
Radiation Protection Supervisor

Week '90

7/23/90

Radioactive Sources/Materials to be Disposed
SRL : Ford Motor Company
Attachment G 2 of 3

I. Not Pkg'd:

2 Jars Thorium Fluoride
" Uranium Acetate
1 Jar Uranyl Sulfate
" Thorium Chloranilate
" Thorium Nitrate
" Uranium "
" Thorium Metal
" Uranyl Phthalocyanine

3 smoke Detectors 1 microcurie each of Radium-226

II. Two Drums Pkg'd Material:

A. Drum # 1 140# @ surface .2mrem

	Isotope	Quantity	Date	Comments
92 yrs	1. Ni-63	15 mCi		S/N 3035 Perkin-Elmer
"	2. "	"	4/84	S/N 3036 Mod. No. 33019
"	3. "	2 mCi	10/71	A 1027 HP " 2-6195
87.9 days	4. S-35	2 mCi	4/26/79	Std. Scintl. Counter
12.3 yrs	5. H^3	200 mCi	7/83	Gas Chrom. (SSECO) NRC 21:04114-25
	6. "	50 mCi	6/81	S/N 481 (A-098)
2.6 yrs	7. Fe-55	10 mCi	7/85	Std. X-ray source (Never opened)
432 yrs	8. Am-241	10 mCi	7/85	S/N S 355115
	9. "	300 mCi	5/78	Std. S/N A455 (Not used) N
453 days	10. Cd-109	25 mCi	9/79	Std. S/N D915 (Not used) "
272 days	11. Co-57	25 mCi	5/78	Std. S/N C1260 (Not used) "
	12 "	2 mCi	—	D. Gieschaw
5.3 yr.	13. Co-60	2 mCi	—	vault # 2
87.9 days	14. S-35	~1.9 μCi	4/79	1.02×10^8 dpm/g ~ 70K Bq (Batch 49/4-) R395

Week '90

Attachment G 3 of 3

Sources to be Disposed
SRL - FMC

15. Al foil 1" dia. Cu-244 No activity

16. Liquid Zn^{65} in hood - No date

17. Dan Melohk watch Beta emitter @ 20mR/Hr.

18.	Po_{-210}	40.0mCi	9/85	S/N 58489 No. 1906
19	"	500.0μCi	10/82	Static Eliminator

B. Drum # 2 190# @ surface .3 mrem

1. A C-14 liquid solns. from Vault # 4

• 250μCi	'84	Ethanol	mixed/solidified with cement
• "	"	Toluene	
• "	"	Cyclohexane	
• "	"	Acetone	
• "	5/85	Methanol	
• 500μCi	5/84	Octanol	

5,730 yrs.

Mixed with above solns.: Uranium/Thorium nitrates and oxides powers (3 jars), pump oil, Zn^{65} (D737) > all solidified

2. Several! Soot samples from bottom of hood 6/85. BKg: Reading, No activity

3. All contaminated flasks etc from above materials

4. wipes from counter top/rags etc.

5.	$Kr-85$	10 mCi	Rod "/21/62	Stainless end-window (Runge)
6.	$Ni-63$	5 mCi	—	ECI Gas Chrom. Infotronics

May 13, 1992

To: Don Greschaw

From: F. B. Johns

Subject: Self-Illuminating Exit Signs

To stop any problem on disposal of Isolite exit light we have returned all purchased lights back to the vendor. We have replaced them with a solid state light from the same vendor.

F. B. Johns

F. B. Johns

Frank Johns

317-823-7440

Part # 634

(21) SLE Sign

MAY-13-92 WED 11:28

Attachment H 1 of 2

CMMSAACA Request For Shipper Header 05/13/92 09:25:15
==> _____ PLT CC05A CON_
Printer: R9800733
RFS NUMBER: 121585 Type RFS: R Ship Type: M N MISC - NO CHARGE
Ship Date: 05/13/92 Time: ____ How Shipped: _____
Retention Dt: 06/13/92 Freight Term: P Mode Trans: M_ Print BOL: Y
Carrier Code: ____ Carrier Name:
Pool Code: ____ Pool Name:
Conv. Number: _____ Conv. In: ____ Conv. Seal: _____ _____
Pick-up Date: _____ Pick-up Time: ____ Cust Dock: ____
Protect Date: _____ Protect Time: ____ Plant Dock: __
Hazrds Matl: N DOT ID: _____ Prod. Shift: _
BOL Number: _____ Shipper Number: Man Shpr Num: _____

Ship To	Alt. Ship To	Ship From	Sold To	Dealer Code	ICM Decl Cd
CE62B	_____	_____	CE62B	_____	__ __

Na: CONNERSVILLE ELECT SUPPLY CO_____ Na: CONNERSVILLE ELECT SUPPLY CO_____
Ad: INDUSTRIAL PARK_____ Ad: INDUSTRIAL PARK_____
CONNERSVILLE_____ IN 47331____ CONNERSVILLE_____ IN 47331____
U.S.A._____ U.S.A._____
Attn: _____
Request Date: 05/13/92 Time: 09:22:54 ID: CVIPS05 Phone: (317) 827-7320
F1=Help F2=Pick List F4=BOL Remarks/Modifications F5=Alternate Carriers
F6=RFS Detail F9=Crt RFS from Preformatted F10=Select Part F11=BOL Consol
CVIPS051

CMMSAJCA Miscellaneous RFS Detail 05/13/92 09:26:27
==> _____ PLT CC05A CON_
Shipper/Pick List Printer: R9800733 Move Ticket Printer: R9800733
RFS NUMBER: 121585 Ship To: CE62B Name: CONNERSVILLE ELECT SUPPLY CO

AC	Ship Qty	Container	C-Cnt	Gross LB	Net LB	Tare LB	Desc Art	Tkts
-	-------	---------	-----	-------	-------	-------	----	--
	1	CTN	0	0	0	0		

Item Description: EXIT SIGNS BEING SHIPPED FOR DISPOSAL,NOT OSHA
OR EPA APPROVED. ATT:GAR BARNETT

Item Number:

Item Description:

Item Number:
F1=Help F2=Pick List F4=Description of Articles F5=Pick List Remarks
F6=Print Move Tickets F9=WTZ Trans Dtl F11=Finalize Ship Act F16=RFS Addl
NO MORE RECORDS AVAILABLE CVIPS051

Copy

Ford

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 3

In the Matter of:	)	Ford Motor Company's Response to Request for Information
	)	
Safety Light Corporation Site	)	
Bloomsburg, Pennsylvania	)	

GENERAL OBJECTIONS

The following is Ford Motor Company's ("Ford's") response to U.S. EPA's undated Request for Information regarding the above-referenced matter, received by the Chairman's Office at Ford on November 10, 2005. Ford objects to this Request for Information on the grounds, among others, that:

1. The definitions of terms in Enclosure 2 are overly broad and seek to impose obligations that are unduly burdensome and oppressive and not required by the Comprehensive Environmental Response, Compensation and Liability Act of 1980 ("CERCLA") or the Superfund Amendments and Reauthorization Act of 1986 ("SARA"), particularly to the extent that they seek to define such terms more broadly than does Section 101 of CERCLA.

2. The Request purports to require that a search be conducted for information regarding potential transactions over the past sixty years and therefore is overly broad and seeks to impose obligations that are unduly burdensome.

3. The Request purports to require that a search be conducted without geographic limitation and therefore is overly broad and seeks to impose obligations that are unduly burdensome.

4. The Request purports to require a response based on information that Ford does not possess or control including, but not limited to, information in the possession, custody and control of vendors, former employees and agents, U.S. government agencies and employees, and other persons.

5. The Request purports to impose a continuing obligation to supplement Ford's response, although no supplementation is required by CERCLA or SARA.

PRELIMINARY STATEMENT

Without waiving or in any way limiting any objection that it has or may have to this Request for Information, Ford states that it has thoroughly reviewed the information and documents contained within corporate files it has maintained to document compliance with various permits issued to Ford by the United States Nuclear Regulatory Commission ("U.S. NRC"). In addition, Ford has conducted inquiries within its corporate purchasing, scientific research, and industrial hygiene activities, and has interviewed a number of current and retired employees responsible for compliance with U.S. NRC requirements and/or with knowledge of the Company's practices regarding disposal of radioactive materials. Reserving all rights and without waiving any objections it has or may have, Ford responds as follows:

QUESTIONS

Question 1. Describe in detail the business relationship between Ford and Safety Light.

Response:

For purposes of this response, Ford assumes that "Safety Light" means Safety Light Corporation and the predecessor or affiliated companies identified in the opening paragraph of U.S. EPA's information request. Based on information provided by U.S. EPA, and on our internal investigation, it appears that Ford and one of its former subsidiaries may have purchased, directly or indirectly, products manufactured by Safety Light or its predecessors or affiliates, as described below:

(a) The copies of two ledger sheets that accompanied U.S. EPA's information request purport to show that Ford purchased "Radium D foil" from Safety Light or a predecessor or affiliate, although there is no indication on the face of the ledger sheets of the name of the corporation from which Radium D foil may have been purchased, and no indication of the year in which the two purported transactions allegedly occurred. Despite a diligent investigation, Ford has not been able to independently confirm the purchases that are implied by the ledger sheets (included as Attachment A) provided by U.S. EPA. Ford has confirmed, however, that the P.O. Box number referenced on the ledger sheets is the P.O. Box number for Ford's Scientific Research Laboratory.

(b) A document located by Ford suggests that it purchased a gas chromatograph for laboratory use by its Stationary Source Environmental Control Office ("SSECO") in 1982 or earlier. The document (see Attachment B) indicates that the manufacturer of the radiation source within the equipment (Model 508-1 foil) was U.S. Radium Corp. The document indicates that the gas chromatograph subsequently was transferred to the Scientific Research Laboratory.

(c) A document located by Ford suggests that a facility (the Connorsville Plant) owned by its former subsidiary (Ford Electronics and Refrigeration Corporation) purchased self-illuminating exit signs that were manufactured by Isolite.

Question 2. Did Ford ever transport and/or broker hazardous substances and/or radioactive waste or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite to the Site?

Response:

Ford has located no documents or discovered any information to suggest that it ever transported or brokered any hazardous substances and/or radioactive waste or other wastes to the Site. See also the response to Question 4.

Question 3. If you answered "yes" to Question 2, please answer the following questions:

a. Provide the name, current address (or most recent address available), telephone number, and contact person for each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes.

b. Provide the time period during which you transported/brokered each customer/generator/transporter's hazardous substances, radioactive waste or other wastes.

c. For each customer/generator/transporter for which you transported/brokered hazardous substances, radioactive waste or other wastes, provide:

i. the entity which received the hazardous substances, radioactive waste or other wastes (i.e., U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite);

ii. the type of hazardous substances, radioactive waste or other wastes that was disposed/reclaimed;

iii. the amount of hazardous substances, radioactive waste or other wastes transported/brokered to the Site by you;

iv. the dates of the pickup/delivery of the hazardous substances, radioactive waste or other wastes;

v. all personal and internal company documents and correspondence regarding the type and amounts of hazardous substances, radioactive waste or other wastes, dates transported/brokered to the Site, and transactions with U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite;

vi. the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other parties that have documentation or information pertaining to the transportation/disposal of hazardous substances, radioactive waste or other wastes at the Site.

Response:

Not applicable.

Question 4. Did Ford ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site?

Response:

Ford has located no documents or discovered any information to suggest that it ever generated any radioactive wastes or other wastes that were disposed of or reclaimed at the Site. Ford believes that the materials that it (or its former subsidiary) purchased, that may have contained source materials supplied by Safety Light Corporation or a predecessor or affiliated corporation, were disposed or reclaimed at locations other than the Site:

(a) It was the general practice of Ford's Scientific Research Laboratory that radioactive wastes were stored in a secure storage vault prior to disposal at commercial disposal firms. Attachment D consists of two memoranda that describe such practice. The first was authored some time between 1967 and 1972; the second is dated March 21, 1983.

With regard to the Radium D foil purportedly purchased by Ford, we reviewed disposal records for the Scientific Research Laboratory and found no documents referencing "Radium D foil"; however, we understand from multiple authorities that the "source material" for this product is in fact "Pb210". We found reference to disposal, in 1985, of a "Pb210" source described as "old 196x" (referring to the approximate date of acquisition). The exact date of acquisition apparently could not be determined. As noted in Attachment E, the disposal was part of an effort to rid the Scientific Research Laboratory storage vault of "all radioactive sources/materials and/or standards that for several years have not been fully used or whose radioactive half-life has depleted their activity to zero." (See Attachment E, page 1 of 7). Pickup of the wastes and their disposal, according to the documents, apparently was handled by AdCO. Reference to the "old 196x" Pb210 source is on page 7 of 7 of Attachment E.

(b) It appears that the tritium source (U.S. Radium) within the gas chromatogragh acquired by Ford's Stationary Source Environmental Control Office ("SSECO"), and subsequently transferred to the Scientific Research Laboratory, was disposed in 1990 through U.S. Ecology. See Attachment G.

(c) The documents included in Attachment H indicate that the Connorsville Plant returned all of the self-illuminating exit signs to the vendor from which they were purchased – Connorsville Elect. Supply Co.

Question 5. If you answered "yes" to Question 4, please address the following issues:

a. Please provide the following information regarding all wastes and by-products produced by your company during the period 1945 to the present:

i. the nature of radioactive waste or other wastes, hazardous substances, and/or by-products used, including their chemical content, characteristics, and physical state (i.e., liquid, solid, gas, or in the form of contaminated rags, cups, containers). Provide chemical analyses and Material Safety Date Sheets ("MSDSs"). If these analyses are not available for the period 1977-1991, submit analyses for the time period closest to these dates and describe, in detail, any changes in the process(es) in which radioactive wastes or other wastes were produced that would affect the chemical analyses;

ii. the annual quantity of radioactive waste or other wastes, hazardous substances, and/or by-products used or generated;

iii. the process(es) in which radioactive wastes or other wastes, hazardous substances, an/or by-products were used or the process(es) that generated each;

iv. the types of containers used to treat, store, or dispose of radioactive waste or other wastes, hazardous substances, and/or by-products; and

v. the method of treatment and/or disposal of the above.

b. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons, including you, who, during the period 1945 to the present, may have:

i. disposed of or treated radioactive or hazardous materials at the Site;

ii. arranged for the disposal or treatment of radioactive or hazardous materials at the Site; and

iii. arranged for the transportation of radioactive or hazardous materials to the Site (either directly or through transshipment points) for disposal or treatment.

c. If your response to the above includes the contracting of a hauler or transporter to transport and/or dispose of wastes, explain these arrangements and provide documentation confirming the nature of those transactions. Please identify:

i. the persons with whom you, or other such persons, made such arrangements;
ii. every date on which such arrangements took place;

iii. for each transaction, the nature and quantity of material, including its chemical content, characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that the generated the substance;

iv. the precise location at which each material was disposed or treated at the Site;

v. the persons who selected the Site as the place at which materials were disposed or treated;

vi. the final disposition of each material involved in such transactions; and

vii. the names of employees, officers, owners, and agents for each transporter.

d. For each and every instance in which you/your company arranged for disposal or treatment of materials at the Site, identify:

i. the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed, or otherwise handled by you; and

ii. any billing information and documents (invoices, trip tickets, manifests) in you possession regarding arrangements made with you company to generate, treat, store, transport, or dispose of materials at the Site.

e. Provide the names, titles, and areas of responsibility of any persons, including all Ford employees, present and former, who are knowledgeable of the waste disposal practices of your company during the period 1945 to the present. Include current addresses and dates of birth for former employees.

f. Describe any permits or applications and any correspondence between Ford and any regulatory agencies regarding materials transported to or disposed at the Site.

g. Provide copies of any correspondence between Ford and any third party regarding materials transported or disposed of at the Site.

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IF DESTINATION IS OUTSIDE OF THE UNITED STATES: THESE COMMODITIES, TECHNOLOGY OR SOFTWARE WERE EXPORTED FROM THE UNITED STATES IN ACCORDANCE WITH THE EXPORT ADMINISTRATION REGULATIONS. DIVERSION CONTRARY TO U.S. LAW PROHIBITED.

3503 6995 840

3503 6995 840

Seq. No. 21

Weight

Billing Ref. 1-L

Bill To

FROM

FORD MOTOR COMPANY
PARKLANE TOWERS WEST
3 PARKLAND BLVD STE 1500
DEARBORN MI
USA 48126
KATHY J. HOFER 313-594-1687

Origin DTW

Shipment No. 35036995-840

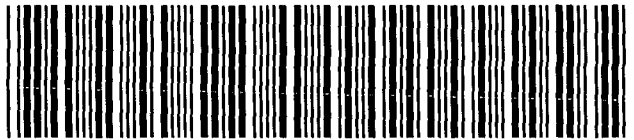
TO

US ENVIRONMENTAL PROTECTION AGENCY
REGION 3
1650 ARCH STREET

PHILADELPHIA PA
USA 19103
HARRY R. STEINMETZ (3HS62)

1 Pc

Service



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